



GEORGETOWN UNIVERSITY LAW CENTER
INSTITUTE FOR PUBLIC REPRESENTATION

Hope M. Babcock
Angela J. Campbell
David C. Vladeck
Directors
Eric D. Albert
Karen Henein+*
Richard McKewen
Jennifer L. Prime+**
Kristi M. Smith
Staff Attorneys

600 New Jersey Avenue, NW, Suite 312
Washington, DC 20001-2075
Telephone: 202-662-9535
TDD: 202-662-9538
Fax: 202-662-9634

May 4, 2005

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**RE: Standardized and Enhanced Disclosure Requirements for Television Broadcast
License Public Interest Obligations, MM Docket No. 00-168.**

Dear Ms. Dortch:

Pursuant to section 1.1206(b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceeding.

On Tuesday, May 3, 2005, representatives of the Public Interest, Public Airwaves (PIPA) Coalition met with Legal Advisor Catherine C. Bohigian of the Office of Chairman Kevin J. Martin. PIPA Coalition members in attendance were: Gloria Tristani of the Office of Communication of the United Church of Christ, Inc.; Meredith McGehee of the Alliance for Better Campaigns; Karen Mennichelli of the Benton Foundation; and Karen Henein of the Institute for Public Representation at Georgetown University Law Center.

The group discussed its proposed broadcast disclosure form previously filed in this docket. *See* Letter from Karen Henein to Marlene Dortch, MM Docket No. 00-168 (Mar. 24, 2005). Members of the PIPA Coalition noted that the current issues and programs lists in broadcasters' public files do not provide an effective means for the public or the Commission to assess a licensee's performance. Because current disclosure requirements are so vague, information available in broadcasters' public files lacks consistency and detail. Thus, it is difficult to evaluate the amount and type of public interest programming a broadcaster carries. PIPA Coalition members stressed the importance of adopting a standardized disclosure form that requires licensees to respond to detailed questions about their public interest programming.

PIPA Coalition members also urged that the Commission adopt rules requiring that disclosure forms and files be available not only at station offices, but on station websites.

Finally, PIPA Coalition members stressed that the Commission should establish new disclosure rules and public interest obligations for broadcasters before it makes any further decisions regarding multicast must-carry or the transition to digital television.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced docket. If you have any questions regarding this filing, please do not hesitate to contact me at (202) 662-9535.

Respectfully Submitted,

/s/

Karen Henein